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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 ALLEGIANT TRAVEL COMPANY,  
15 Plaintiff,  
16 v.  
17 R2 SOLUTIONS LLC,  
18 Defendant.  
19

Case No. 2:22-cv-00828-CDS-BNW

**UNOPPOSED MOTION TO EXTEND R2  
SOLUTIONS LLC'S TIME  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(First Request)**

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21 Defendant R2 Solutions LLC (“Defendant”) brings this unopposed motion to extend the  
22 time for it to respond to Plaintiff Allegiant Travel Company’s (“Plaintiff”) Complaint for  
23 Declaratory Judgment of Non-Infringement (ECF 1). To this end, Defendant requests, and  
24 Plaintiff does not oppose, an extension of thirty (30) days to and including July 16, 2022 to do so.  
25 Pursuant to LR IA 6-1, this is the first request to extend the time to respond to Plaintiff’s  
26 complaint.

27 This request is not made for the purpose of delay. Patent cases are complex. Plaintiff’s  
28 Complaint involves seven distinct patents, at least three of which have not been litigated in prior

1 patent infringement litigation brought by Plaintiff in the United States District Court for the  
2 Eastern District of Texas. As such, there is much for Defendant's counsel to consider in advance  
3 of Defendant's response.

4 Because patent cases are complex, minimum 30-day extensions like the one requested here  
5 are routine. Knowing that additional time would be necessary, Defendant's counsel approached  
6 Plaintiff's lead counsel about such an extension via email on May 31, 2022. *See* Exh. A.  
7 Plaintiff's counsel replied that Plaintiff does not oppose a 30-day extension. *Id.*

8 Complicating this case further is the fact that it is a declaratory judgement action with  
9 complex jurisdictional issues and the presence of a mutual non-disclosure agreement, all of which  
10 need to be properly investigated and addressed, as necessary or appropriate.

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1 For the foregoing reasons, Defendant respectfully asks that the Court grant this unopposed  
2 motion re-setting Defendant's deadline to respond to Plaintiff's complaint to July 16, 2022.

3 Dated this 16<sup>th</sup> day of June, 2022.

4 HUTCHISON & STEFFEN, PLLC

5 */s/ Joseph R. Ganley*

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15 *Attorneys for defendant*  
R2 Solutions LLC

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18 **IT IS SO ORDERED.**

19 DATED: June 21, 2022

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28 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of June, 2022, I caused a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND R2 SOLUTIONS LLC'S TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to be submitted electronically for filing and service with the United States District Court for the District of Nevada via the Electronic Filing System to the following:

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